

**REMARKS**

Claims 18-34 are pending in the present application. In view of the following, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

Applicants thank the Examiner for acknowledging acceptance of the claim for foreign priority, as well as indicating that all copies of the certified copies of the priority documents have been received.

**A. Rejection of Claims 18 and 27 under 35 U.S.C. § 112, second paragraph**

Claims 18 and 27 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter of the invention. Claims 18 and 27 were also rejected under § 112, second paragraph, as being incomplete for omitting essential structural relationships of elements. In order to expedite prosecution, claims 18 and 27 have been amended to particularly point out the structure of the control units as well as clarify that the software programs are executed by the control units. In view of the amendment, withdrawal of the rejections is requested.

**B. Rejection of Claims 18-34 under 35 U.S.C. § 103(a)**

Claims 18-34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,622,083 ("Knockeart"). Applicants respectfully submit that this rejection should be reversed for at least the following reasons.

In order for a claim to be rejected for obviousness under 35 U.S.C. § 103(a), the prior art must teach or suggest each element of the claim. See Northern Telecom, Inc. v. Datapoint Corp., 908 F.2d 931, 934 (Fed. Cir. 1990), cert. denied, 111 S. Ct. 296 (1990); In re Bond, 910 F.2d 831, 834 (Fed. Cir. 1990). To establish a *prima facie* case of obviousness, the Examiner must show, *inter alia*, that there is some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify or combine the references, and that, when so modified or combined, the prior art teaches or suggests all of the claim limitations. M.P.E.P. §2143. In addition, as clearly indicated by the Supreme Court, it is "important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements" in the manner claimed. See KSR Int'l Co. v. Teleflex, Inc., 127 S. Ct. 1727 (2007). In addition, all the

teachings of the prior art must be considered, including those which teach away from the claimed invention. (See MPEP 2143.01.II). To the extent that the Examiner may be relying on the doctrine of inherent disclosure to support the obviousness rejection, the Examiner must provide a “basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristics necessarily flow from the teachings of the applied art.” (See M.P.E.P. § 2112; emphasis in original; see also Ex parte Levy, 17 U.S.P.Q.2d 1461, 1464 (Bd. Pat. App. & Inter. 1990)).

Amended claim 18 recites the following:

18. A method for operating at least two interconnected control units, the method comprising:

accessing sensor data with the control units, each of the control units having a housing with a plurality of inputs for connecting to a plurality of sensors and processors, wherein one of the control units is a master control unit and the remaining control unit is a slave control unit that receives synchronization information from the master unit;

executing at least one software program for controlling operational sequences on all the control units, in a vehicle; and

continuously synchronizing the control units by continuously transmitting synchronization information between the control units;

wherein the control units execute the same software program time-synchronously using a settable time lag.

In support of the rejection of claim 18, the Examiner summarily asserted that Knockart disclosed the presence of at least two control units that access sensor data. Applicants strongly disagree with the Examiner’s contention since Knockart clearly does not disclose or suggest the presence of at least two control units that access sensor data. On page 3 of the Office Action, the Examiner cited reference numbers 160 (removable personal device) and 210 (onboard computer) for the disclosure of two interconnected control units. See Knockart, Fig. 2. However, Figure 2 of Knockart clearly demonstrates that both the removable personal device and the onboard computer are not used to access sensor data. The sensors (reference number 230) are clearly not connected to the removable personal device (160), and thus the removable personal device does not and cannot access sensor data. In contrast to amended claim 18, which recites that each of the control units have inputs that are

connected to a plurality of sensors, there is clearly no such disclosure or suggestion in the Knockeart reference.

Furthermore, the Examiner also asserted that Knockeart disclosed using the control units to exchange synchronization information. Examiner specifically alluded to Col. 8, lines 6-12 of Knockeart, which section discusses a one-time download of information from the removable device to the onboard computer as well the capability of uploading data from the onboard computer to the removable device. See Knockeart, col. 8, lines 6-12. Again, Applicants disagree with the Examiner's assertion. In the present invention, sensor data is continuously exchanged between the control units. In Knockeart, data can only be transferred from the removable device to the onboard computer when the removable device is first docked on the docking station. See id. Knockeart does not disclose or suggest the continuous synchronization of control units by continuously exchanging synchronization information as sensor data is updated.

Applicants would also like to point out that the Examiner failed to address the limitation that the control units execute the same software program synchronously using a settable time lag.

For at least the foregoing reasons, claim 18 and its dependent claims 19-26 are allowable over Knockeart. Claim 27 recites a computer system structure and includes limitations substantially analogous to the limitations recited in claim 18. Accordingly, claim 27 and its dependent claims 28-34 are allowable for essentially the same reasons as claim 18. Furthermore, claim 27 has also been amended to recite that the control units are continuously interconnected. Knockeart does not disclose or suggest the presence of two continuously interconnected control units (as removable personal device 160 is clearly removable).

Withdrawal of the obviousness rejection of claims 18-34 is requested.

**CONCLUSION**

In view of the above, it is respectfully submitted that all of presently pending claims 18-34 are allowable. For the foregoing reasons, it is respectfully submitted that the final rejections of all claims should be withdrawn. Since all issues raised by the Examiner have been addressed, an early and favorable action on the merits is respectfully requested.

Respectfully submitted,

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